

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CITY OF SOMERVILLE,

Plaintiff,

v.

SHAWN WILLIAMS, as SUPERVISOR OF
PUBLIC RECORDS,

Defendant.

CIVIL ACTION
NO. 1:15-cv-12331

**MEMORANDUM OF REASONS IN SUPPORT OF DEFENDANT'S ASSENTED-TO
MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT**

For the following reasons, defendant Shawn Williams, Supervisor of Public Records, requests a 30-day extension of time until August 10, 2015, to file an answer or otherwise respond to the complaint:

1. Undersigned counsel for defendant was assigned this case on June 19, 2015. Soon thereafter, she had discussions with plaintiff's counsel and notified him of her intent to move to dismiss the complaint.
2. The current answer or response deadline is July 9. With the consent of plaintiff's counsel, however, undersigned counsel delayed preparing the motion to dismiss while the parties explored whether the case could be resolved.
3. On or about July 2, plaintiff's counsel informed undersigned counsel that she should move forward with the motion to dismiss.
4. Given other professional commitments this week, undersigned counsel will be unable to prepare the motion and have it reviewed and approved by the current July 9 deadline. In addition, counsel will be out of the office on a pre-planned trip from July 9 to July 20.

5. For these reasons defendant respectfully requests an extension of time until August 10 to respond to the complaint. Plaintiff's counsel has assented to this motion.

Respectfully submitted,

SHAWN WILLIAMS, as SUPERVISOR OF
PUBLIC RECORDS

By his attorney,

MAURA HEALEY
ATTORNEY GENERAL

/s/ Sookyoung Shin
Sookyoung Shin, BBO No. 643713
Assistant Attorney General
Government Bureau
One Ashburton Place
Boston, MA 02108-1698
(617) 963-2052
sookyoung.shin@state.ma.us

July 7, 2015

CERTIFICATE OF SERVICE

I hereby certify that the above document will be served on July 7, 2015, by electronic notice for registered counsel and a copy will be served by first-class mail, postage pre-paid, for non-registered counsel.

/s/ Sookyoung Shin

Sookyoung Shin

Assistant Attorney General